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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JUAN URIAS-TORRES,  
  
Defendants.

CASE NO. 1:23-CR-00099-JCC-BAM

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER

DATE: February 19, 2025  
TIME: 1:00 p.m.  
COURT: Hon. Barbara A. McAuliffe

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. Defendant is set for a status conference on **February 19, 2025**, in front of the Honorable Sheila K. Oberto, U.S. Magistrate Court Judge. The parties wish to **continue the status conference to February 26, 2025**.

2. This case is trailing behind the defendant's other case, U.S. v. Leiva-Leiva, 1:22-cr-00232, also being set for that date.

3. That case, in which defendant is charged with RICO Conspiracy and VICAR Murder, is more serious than the instant case and the resolution of the lead case will materially impact the resolution of this case.

4. The defendant agrees to exclude time through February 26, 2025, inclusive.

5. The parties agree and stipulate, and request that the Court find the following:

1 a) The discovery associated with this case includes investigative reports,  
2 photographs and videos, as well as cellular phone extractions. All this discovery has been either  
3 produced directly to counsel and/or produced to a court-appointed discovery coordinator, and/or  
4 made available for inspection and copying.

5 b) Counsel for defendant desire additional time to consult with her client, conduct  
6 investigation, review the voluminous discovery, prepare for a possible trial, and explore a  
7 potential resolution of the case.

8 c) Counsel for defendant believes that failure to grant the above-requested  
9 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
10 into account the exercise of due diligence.

11 d) The government does not object to the continuance.

12 e) Based on the above-stated findings, the ends of justice served by continuing the  
13 case as requested outweigh the interest of the public and the defendant in a trial within the  
14 original date prescribed by the Speedy Trial Act.

15 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
16 et seq., within which trial must commence, the time period of February 19, 2025, to February 26,  
17 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(i), B(ii), and  
18 B(iv) because the case is so unusual or so complex, due to the number of defendants, the nature  
19 of the prosecution, or the existence of novel questions of fact or law, that it is unreasonable to  
20 expect adequate preparation for pretrial proceedings or for the trial itself within the time limits  
21 established by this section. This stipulation also results from a continuance granted by the Court  
22 at defendant's request on the basis of the Court's finding that the ends of justice served by taking  
23 such action outweigh the best interest of the public and the defendant in a speedy trial.

24 6. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
25 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
26 must commence.

1 IT IS SO STIPULATED.

2  
3  
4 Dated: January 2, 2025

PHILLIP A. TALBERT  
United States Attorney

5  
6 /s/ Robert L. Veneman-Hughes  
ROBERT L. VENEMAN-HUGHES  
Assistant United States Attorney

7  
8 Dated: January 2, 2025

/s/ Adilene Flores Estrada  
ADILENE FLORES ESTRADA  
Counsel for Defendant  
Juan Carlos Urias-Torres

9  
10  
11  
12 **ORDER**

13 IT IS SO ORDERED that the status conference is continued from February 19, 2025, to **February**  
14 **26, 2025, at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe.** Time is  
15 excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(i), B(ii), and B(iv).  
16

17  
18 IT IS SO ORDERED.

19 Dated: January 2, 2025

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE